

BEYS STEIN MOBARGHA & BERLAND LLP

JASON H. BERLAND

646.755.3604 (Direct)

jberland@beysstein.com

January 13, 2015

VIA ECF

The Honorable Justice Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square – Room 1106
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/13/2015

**Re: Sea Trade Maritime Corp. v. Coutsodontis, et al. (Index No. 09 Civ. 488 (LGS) (HBP)),
Request for Extension of Time to File Summary Judgment Responses**

Dear Judge Schofield:

We are counsel to Plaintiffs Sea Trade Maritime Corporation and George Peters in the above referenced action. We write to request a brief extension of time from January 19, 2015 until February 9, 2015 to file Plaintiffs' oppositions to Defendants' motions for summary judgment. The basis of our request is: (i) Judge Pitman's recently scheduled January 21, 2015 discovery conference to address outstanding discovery issues; (ii) our pending request to Judge Pitman to recommend a default judgment against Defendants Stelios Coutsodontis and Francesca Coutsodontis (the "Coutsodontis Defendants") for their willful failure to comply with their discovery obligations, or in the alternative, to order an adverse inference instruction; and (iii) the Coutsodontis Defendants' obligation to produce documents which are still outstanding and responsive to our document requests. As previously stated in our correspondence with this Court, these issues are crucial to Plaintiffs' responses to Defendants' motions for summary judgment.

This is Plaintiffs' second request for an extension of time on this matter. On December 4, 2014, this Court granted our first request for an extension.

Yesterday, after receiving notice from Judge Pitman of the January 21, 2015 conference, we inquired whether Defendants consented to this request. We have not yet received a response.

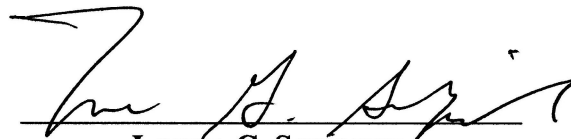
Application GRANTED. Plaintiffs' responses to Defendants' summary judgment motions shall be filed no later than February 9, 2015. Any replies shall be filed no later than February 16, 2015. The parties are advised that absent extraordinary circumstances no further extensions will be granted.

Respectfully submitted,

/s/ Jason H. Berland
Jason H. Berland
Counsel for Plaintiffs

Dated: January 13, 2015
New York, New York

The C



LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

New York, NY 10174
99